

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
UNITED STATES OF AMERICA,	:
	:
Plaintiff,	:
	:
– v. –	:
	:
ROSS WILLIAM ULBRICHT,	:
	:
Defendant,	:
	:
	:
ANY AND ALL ASSETS OF SILK ROAD;	:
	:
And All Property Traceable Thereto,	:
Including But Not Limited to the	:
BITCOINS LOCATED ON ULBRICHT's	:
COMPUTER HARDWARE,	:
	:
Defendant-in-rem.	:
-----X	

13 Civ. 6919 (KBF)

ANSWER BY DEFENDANT  
ROSS WILLIAM ULBRICHT

Defendant ROSS WILLIAM ULBRICHT, as and for his Answer to Plaintiff's Verified Complaint, by his attorneys, Joshua L. Dratel, P.C., respectfully alleges, upon information and belief, as follows:

JURISDICTION AND VENUE

1. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 1 of the Verified Complaint.
2. Denies the allegations contained in paragraph 2 of the Verified Complaint.
3. Denies the allegations contained in paragraph 3 of the Verified Complaint.
4. Denies the allegations contained in paragraph 4 of the Verified Complaint.

FACTUAL OVERVIEW

5. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 5 of the Verified Complaint.
6. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 6 of the Verified Complaint.
7. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 7 of the Verified Complaint.
8. Ross William Ulbricht exercises his Fifth Amendment right and declines to answer the allegation contained in paragraph 8 until after his appeal from his criminal conviction(s) has been decided.
9. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 9 of the Verified Complaint.
10. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 10 of the Verified Complaint.
11. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 11 of the Verified Complaint.
12. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 12 of the Verified Complaint.
13. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 13 of the Verified Complaint.
14. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 14 of the Verified Complaint.

15. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 15 of the Verified Complaint.

THE RELATED CRIMINAL CASE

16. Denies the allegations in paragraph 16 of the Verified Complaint.
17. Admits the allegations in paragraph 17 of the Verified Complaint.
18. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 18 of the Verified Complaint.
19. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 19 of the Verified Complaint.
20. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 20 of the Verified Complaint.
21. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 21 of the Verified Complaint.

BITCOINS IN GENERAL

22. Admits the allegations in paragraph 22 of the Verified Complaint.
23. Admits the allegations in paragraph 23 of the Verified Complaint.
24. Admits the allegations in paragraph 24 of the Verified Complaint.
25. Admits the allegations in paragraph 25 of the Verified Complaint.
26. Admits the allegations contained in the first sentences of paragraph 26 of the Verified Complaint. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in the last sentence of paragraph 26

of the Verified Complaint.

BITCOINS IN GENERAL

27. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 27 of the Verified Complaint.
28. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 28 of the Verified Complaint.
29. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 29 of the Verified Complaint.
30. Ross William Ulbricht exercises his Fifth Amendment right and declines to answer the allegation contained in paragraph 30 until after his appeal from his criminal conviction(s) has been decided.
31. Ross William Ulbricht exercises his Fifth Amendment right and declines to answer the allegation contained in paragraph 31 until after his appeal from his criminal conviction(s) has been decided.

PROBABLE CAUSE FOR FORFEITURE

32. Denies the allegations in paragraph 32 of the Verified Complaint.
33. Lacks and/ or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 33 of the Verified Complaint.
34. Lacks and/ or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 34 of the Verified Complaint.
35. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 35 of the Verified Complaint.

FIRST CLAIM: FORFEITURE UNDER 18 U.S.C. § 981(a)(1)(A)

- 36. Ross Ulbricht reasserts the answers set forth in ¶¶ 1-35 of this submission.
- 37. Admits the allegations in paragraph 37 of the Verified Complaint.
- 38. Admits the allegations in paragraph 38 of the Verified Complaint.
- 39. Admits the allegations in paragraph 39 of the Verified Complaint.
- 40. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 40 of the Verified Complaint.
- 41. Lacks and/or denies sufficient knowledge or information to form a belief as to the allegations contained in paragraph 41 of the Verified Complaint.

SECOND CLAIM: CIVIL MONEY LAUNDERING PENALTIES

(18 U.S.C. §§ 1956(a)(1)(a) and (b))

- 42. Ross Ulbricht reasserts the answers set forth in ¶¶ 1-35 of this submission.
- 43. Admits the allegations in paragraph 43 of the Verified Complaint.
- 44. Ross William Ulbricht exercises his Fifth Amendment right and declines to answer the allegation contained in paragraph 44 until after his appeal from his criminal conviction(s) has been decided.
- 45. Ross William Ulbricht exercises his Fifth Amendment right and declines to answer the allegation contained in paragraph 45 until after his appeal from his criminal conviction(s) has been decided.
- 46. Denies the allegations in paragraph 46 of the Verified Complaint.

THIRD CLAIM: CIVIL MONEY LAUNDERING PENALTIES

(18 U.S.C. §§ 1956(a)(1)(b) and (b))

47. Ross Ulbricht reasserts the answers set forth in ¶¶ 1-35 of this submission.
48. Ross William Ulbricht exercises his Fifth Amendment right and declines to answer the allegation contained in paragraph 48 until after his appeal from his criminal conviction(s) has been decided.
49. Ross William Ulbricht exercises his Fifth Amendment right and declines to answer the allegation contained in paragraph 49 until after his appeal from his criminal conviction(s) has been decided.
50. Denies the allegations in paragraph 50 of the Verified Complaint.

Wherefore, defendant ROSS WILLIAM ULBRICHT demands judgment dismissing the Verified Complaint herein, with prejudice, and for the costs and disbursements of this action.

Dated: 21 September 2015  
New York, New York

Respectfully Submitted,

/S/ Lindsay A. Lewis  
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